

From: [Gregg, Diane](#)
To: [Moore, Gary](#)
Cc: [Warren, Christy](#)
Subject: RE: Sample Status
Date: Monday, November 17, 2014 8:18:31 AM

Guy is correct that you can't add non-detects together. However, your contractor is also correct if the analytes were really present at just below the levels indicated, then cumulatively they could be more than the MCL ($0.0042 + 0.0057 \text{ mg/L} = 0.0092 \text{ mg/L}$; which is $>0.008 \text{ mg/L}$). I highly doubt that these analytes are present though. Even in real world samples where pesticides are known to be present, we rarely ever detect heptachlor epoxide. Heptachlor is seen but not the epoxide. I would say it's a pretty safe bet that these are not present $>0.008 \text{ mg/L}$ cumulatively. We can try to check for you if you want us to. Let us know.

We're running the FT1004 for DNTs now. We'll let you know if the GC/QQQ works to confirm the absence of this analyte. If not we'll try our GC/NPD.

From: Moore, Gary
Sent: Monday, November 17, 2014 7:59 AM
To: Gregg, Diane
Cc: Warren, Christy
Subject: Re: Sample Status
Container Questioned TCLP Codes Deleted (Houston Lab)
FT1004 D030, D032 D032
FT506 D020, D031(?) D020

Diane:

Based upon what you previously told me, we have cleared up D032 for FT1004 and D020 for FT506. I believe that all I need to clear up now is DNT for FT1004 and maybe D031 from FT506. My contractor had an issue with the D031 for FT506 but the TCLP results were:

Analyte TCLP Result (mg/l) SDL (mg/l)

Heptachlor 0.0042 U 0.0042

Heptachlor Epoxide 0.0057 U 0.0057

Her concern was that when you add the detection undetect results together they would exceed the regulatory level for Heptachlor (and its epoxide) of 0.008 mg/l . I talked with Guy Tidmore and he indicated that you can't really add non-detect levels together. For me, out of an abundance of caution, I was going to go ahead and have us make this determination so there is no question. What do you think? Does this make sense or do we not need to worry because it's not an issue?

We definitely need to determine DNT for FT1004. Maybe Heptachlor and Heptachlor Epoxide for FT506.

Call me on my cell.

Thanks

Gary Moore

Federal On-Scene Coordinator

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From: Gregg, Diane

Sent: Monday, November 17, 2014 6:47 AM

To: Moore, Gary; Warren, Christy

Subject: RE: Sample Status

We were analyzing both samples for all three analytes (DNT, HCB and Chlordane). Is this correct that you do not need Chlordane on FT1004? This is the sample we were going to reanalyze today after additional cleanup? Also, we did not analyze for Heptachlor and the epoxide. We could look into analyzing the extract for those on FT506 but we would not have the normal QC (we used chlordane in the BS, MS/MSD).

Please let us know if we can cancel Chlordane on FT1004 and if you would like us to add Hept and Hept Epox to FT506.

Thanks

From: Moore, Gary

Sent: Sunday, November 16, 2014 4:34 PM

To: Gregg, Diane; Warren, Christy

Subject: Re: Sample Status

Diane:

Thanks for all your help. We may need some additional help on some others later so if you guys have figure out a good system for oily samples that would be great. I will try to limit the number of samples to send you unless the disposal will be very costly.

Container Questioned TCLP Codes Deleted (Houston Lab)

FT1004 D030, D032 D032

FT506 D020, D031(?) D020

On FT506, can you tell anything about heptachlor and heptachlor epoxide. Each showed non-detect at the regulatory level but these are apparently additive for RCRA Waste determinations. I think it would be non-haz but wanted to see if you guys have a call based upon Heptachlor (and its epoxide). I was planning on making the call as non-haz since each was non-detect individually at the regulatory level.

On FT1004, The only code if have left for final determination is D030 (DNT).

Thanks again for all your help.

Gary Moore

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From: Gregg, Diane

Sent: Friday, November 14, 2014 2:37 PM

To: Moore, Gary; Warren, Christy

Subject: RE: Sample Status

Hi Gary,

I was working on an email when I got your response.

We can definitively prove there is no hexachlorobenzene in either sample. We can prove there is no chlordane in Sx 1411006-02 (FT506). We are going to do an additional cleanups on sample 1411006-01 (FT1004) for chlordane to try to remove phenolic interferences which are too high (would result

in a reporting limit about 10X too high). As for DNT (per our previous emails), the presence/absence is masked by the oil on a GC-MS (single quad). We will have to rerun the extracts using our GC-QQQ next week. If GC-QQQ doesn't provide us an answer, we can try our nitrogen phosphorous detector or some additional cleanups.

So we can knock out some codes for you and I still have hope to knock out more. Will let you know next week as soon as we know something.

Have a great weekend.

From: Moore, Gary

Sent: Friday, November 14, 2014 1:04 PM

To: Warren, Christy; Gregg, Diane

Subject: CES: Sample Status

Christy/Diane:

Can you give me a status of the samples that I sent to you guys?

Thanks for your help.

Gary Moore

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